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June 29, 2005

By Courier and E-File

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd floor
Boston, MA 02202

Re: Bay State Gas Company, D.T.E. 05-27

Dear Ms. Cottrell:

Enclosed please find the Opposition of Bay State Gas Company to the Attorney General's Motion for Leave to Submit Additional Argument in Support of his Motion to Compel.

Very truly yours,

Robert L. Dewees, Jr.

cc: Caroline O'Brien Bulger, Esq., Hearing Officer
A. John Sullivan, DTE (7 copies)
Andreas Thanos, Assistant Director, Gas Division
Alexander J. Cochis, Assistant Attorney General (4 copies)
Paul R. Osborne, Assistant Director, Rates and Revenue Requirements Division
Service List

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Petition of Bay State Gas Company)
For Approval of Revised Tariffs)
And Other Rate Modifications)

D.T.E. 05-27

**OPPOSITION OF BAY STATE GAS COMPANY
TO THE ATTORNEY GENERAL'S MOTION FOR LEAVE TO SUBMIT
ADDITIONAL ARGUMENT IN SUPPORT OF HIS MOTION TO COMPEL**

On June 22, 2005, the Attorney General filed a Motion for Leave to Submit Additional Argument in Support of his Motion to Compel with respect to information request AG 2-18. It appears that the basis for this Motion is his objection to Bay State's offer to permit him to inspect the Company's leak data files and maps in its operations centers.

Bay State Gas Company ("Bay State" or "the Company") opposes this further Motion for the reasons contained in Bay State's Opposition filed June 21, 2005 to the Attorney General's Motion to Compel. The Attorney General has failed to justify additional argument on his Motion to Compel.

Early in this proceeding, the Company explained to the Attorney General in discovery conferences and otherwise the types of data the Company maintains regarding corrosion and leaks in its distribution system. The Attorney General was informed that data on corrosion and leaks is maintained in individual pipe segment work order "dossiers" which contain information related to specific segments of pipe on which work has been performed. There are thousands of such pipe segment dossiers, and frequently a dossier may contain many years of data. The

Attorney General was also informed that it is not possible to copy all such dossiers. In addition, the Company maintains thousands of system maps, many containing leak data information, which also cannot all be copied. The Company provided the Attorney General with sample copies of such maps and dossiers, and was given the opportunity to view any of the dossiers and maps located in the Company's operations centers. However, he has refused these offers. See Opposition of Bay State Gas Company to the Attorney General's Motion to Compel, June 21, 2005, pp. 2-3; June 5, 2005 letter from Patricia M. French to Caroline M. Bulger; June 9, 2005 letter to the Attorney General submitting sample project dossiers for locations in Brockton and Springfield; June 17, 2005 letter to the Attorney General enclosing samples of the Company's distribution system maps, leak plot maps and work order management system ("WOMS") printouts.

The Attorney General claims he cannot identify the responsible witness to examine regarding corrosion in the Company's distribution system. Bay State's General Manager, Danny G. Cote, is clearly identified in the Company's initial filing as the appropriate witness for this topic. Further, the Attorney General requests that the Company file the material it submitted to the Attorney General on June 9, 2005, with the Department and all parties. The Company has filed a supplemental response to AG 2-17 with respect to that material.

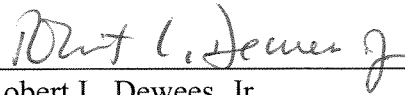
In light of the Company's offer to permit the Attorney General to inspect any of its leak data files and maps, the Attorney General's allegation of "dilatory tactics" is without basis.

For the reasons set forth above, the Attorney General's Motion for Leave to Submit Additional Arguments should be denied.

Respectfully submitted,

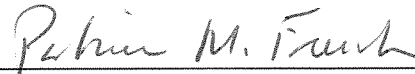
BAY STATE GAS COMPANY

By its attorneys,



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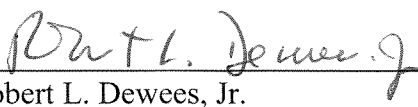
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Dated: June 29, 2005

CERTIFICATION

I certify that I served today a copy of the attached Opposition of Bay State Gas Company to the Attorney General's Motion for Leave to Submit Additional Argument in Support of his Motion to Compel by hand delivery, first class mail, postage prepaid, or electronically on the Department of Telecommunications and Energy and all parties on the service list on file with the Secretary of the Department of Telecommunications and Energy for this proceeding.

Dated at Boston, Massachusetts this 29th day of June, 2005


Robert L. Dewees, Jr.